

Hearing Date: July 13, 2022, 10:00 a.m.
Objections Date: April 19, 2022
Reply Date: May 19, 2022

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Attorneys for Parson Finance Panama S.A,

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

PARSON FINANCE PANAMA S.A.,

Defendant.

Adv. Pro. No. 11-02542 (CGM)

NOTICE OF MOTION TO DISMISS

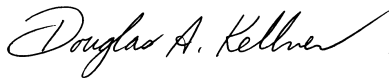
PLEASE TAKE NOTICE that, upon Parson Finance Panama S.A.'s Memorandum of Law in Support of Its Motion to Dismiss, the accompanying Declarations of Douglas A. Kellner and Christian Verling, and the exhibits thereto, the Complaint in this adversary proceeding, and all prior pleadings and proceedings herein, defendant Parson Finance Panama S.A. ("Parson Finance") will move this Court on July 13, 2022 at 10 a.m. for an order dismissing the Complaint filed by plaintiff Irving H. Picard, Trustee (the "Trustee") for the Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff, pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), as made applicable by Rule 7012 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Amended Stipulation and Order entered January 13, 2022 (ECF #91), the Trustee shall respond to this motion by April 19, 2022 and Parson Finance shall file its reply by May 19, 2022.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Defendant does not consent to the entry of final orders or judgment by this Court.

Dated: February 18, 2022

KELLNER HERLIHY GETTY & FRIEDMAN, LLP

By:  _____

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